

RUSTIN S. POLK
Texas Bar No. 00784773
POLK & ASSOCIATES
214bankruptcy.com
4514 Cole Ave., Suite 600
Dallas, Texas 75205
Telephone (214) 740-1160
Telecopier (214) 572-7273

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: § CASE NO. 09-38264
§
LIF ESMAEL MODABBERI § CHAPTER 13
§

DEBTORS' RESPONSE TO
TRUSTEE'S NOTICE OF INTENT
TO CERTIFY CHAPTER 13 CASE FOR DISMISSAL

COMES NOW the Debtor above-named, through counsel, in response to the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal filed herein and respectfully show the Court:

1. The Debtor originally filed this case pro se.
2. The Debtor, on 2/25/2010, retained the law firm Polk & Associates to represent him in the above-captioned case and are getting all the information together for the Trustee.

THEREFORE, the Debtor request that the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal be denied.

Respectfully submitted,

/s/ Rustin Polk
RUSTIN S. POLK
Texas Bar No. 00784773
POLK & ASSOCIATES
214bankruptcy.com
4514 Cole Ave., Suite 600
Dallas, Texas 75205
Telephone (214) 740-1160
Telecopier (214) 572-7273
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all parties as indicated on February 26, 2010.

/s/ Rustin Polk

Debtors:

Lif Esmael Madabberi
3883 Turtle Creek Blvd., #2010
Dallas, TX 75219
via ecf and USPS

Bankruptcy Trustee:

Tom Powers
Standing Chapter 13 Trustee
125 E. John Carpenter, Ste 1100
Irving, TX 75062
via ecf

US Trustee:

William Neary
Office of the US Trustee
1100 Commerce, Rm 9C60
Dallas, TX 75242
via ecf

All Parties Requesting Notice

via ecf or usps first class